REMARKS

The Office Action mailed September 23, 2005 has been received and reviewed. Claims 31-54 are in the case. Claim 50 stands objected to due to an informality. Claims 34, 44 stand rejected under 35 U.S.C. §112, first paragraph. Claims 31-49 stand rejected under 35 U.S.C. §112, second paragraph. Claims 31-49 stand rejected under 35 U.S.C. §101. Claims 31-35, 46, and 50-52 stand rejected under 35 U.S.C. §102. Claims 31-35, 46, and 50-52 stand rejected under 35 U.S.C. §102 (e). Claims 36-40, 47-49, and 53 stand rejected under 35 U.S.C. §103 (a). Claims 31-35, 41-46, 50-52, and 54 stand rejected under 35 U.S.C. §102 (e). Additionally, the drawings are objected to due to an informality with respect to Figure 20.

By this Amendment, claims 31-54 have been cancelled and claims 55-81 have been newly added. Consequently, many of the Examiner's objections and/or rejections with respect to claims 31-54 are now moot. Newly added claims 55-81 are very similar in wording and nearly identical in content and scope to original claims 1-30, which were cancelled by prior amendment. As a result, various arguments made in the previous Response to Office Action (i.e., "Amendment A" mailed on June 27, 2005) may be relevant to newly added claims 55-81. Thus, Applicants refer the Examiner to the previous Response to Office Action for arguments that are relevant to claims 55-81.

Applicants assert that none of the prior art references cited by the Examiner in this Office Action (mailed September 23, 2005) or the previous Office Action (mailed January 25, 2005) disclose either alone or in combination the features recited by claims 55-81. For example, with respect to newly added independent claim 55, none of the prior art references either alone or in combination disclose "an input module and design module, further configured *to automatically provide multiple schematic representations* of a selected design element . . . reflecting *distinct operational contexts* of the

selected design element." As described in Applicants' specification, these *operational contexts* may include, for example, an "air handler," "air flow," or "hydronic" schematic which may represent "the transport of mass, energy, or the like." (Page 20, paragraphs 2 and 3). Furthermore, by *"automatically provid[ing] multiple schematic representations,"* as required by claim 55, a "user may not [] be limited to placing every possible schematic representation of a component in a project." (Page 21, paragraph 1). Likewise, none of the prior art cited by the Examiner either alone or in combination teaches the elements recited by newly added independent claim 75.

With respect to newly added claim 56, Applicants' recitation that "the input module and user interface module are configured to interface with the design module *substantially independently from one another*" is supported in the specification. Specifically, the specification states that the "input module may include a user interface module, or the user interface module *may be a separate module*" (page 14, paragraph 3). Thus, Applicants assert that any objection to claim 56 based on non-disclosure in Applicants' specification or Figures is improper.

Furthermore, Applicants hereby respond to Examiner's previous rejections under 35 U.S.C. § 112, first paragraph, in the Office Action mailed on February 25, 2005. In that Office Action, the Examiner was concerned that the specification did "not describe what the components of [the] modules [were] and how they [were] connected." In response, Applicants assert that the specification need not disclose all aspects of commonly known programming techniques to satisfy 35 U.S.C. §112, first paragraph. As may be appreciated, there are numerous ways in which a given module may be configured to perform a particular function. Once the function of a module is set forth, a programmer of ordinary skill in the art may "configure" a module to perform that function in any suitable way. According to prior case law, "[t]he claimed invention ... is not in the details of the program writing, but

in the apparatus and method whose patentability is based on the claimed combination of components or steps." *Northern Telecom*, 908 F.2d at 941. "[T]he conversion of a complete thought ... into a language a machine understands is necessarily *a mere clerical function* to a skilled programmer." *Id.*, at 943 (emphasis added).

Applicants assert that claims 55-81 are in condition for immediate allowance. Favorable reconsideration of the application in view of the following remarks, is therefore respectfully requested.

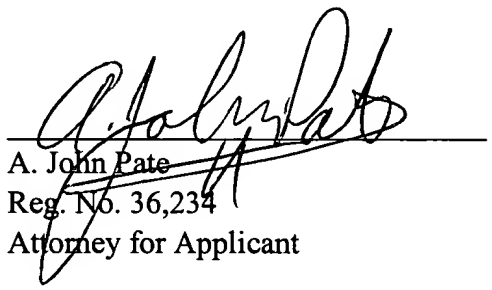
Objection to the Drawings

Figure 20 stands objected to because "component object 338" should be labeled "connector object 338." Accordingly, Applicants have amended Figure 20 and have provided a replacement sheet in accordance with C.F.R. § 1.84 and § 1.121.

In the event that the Examiner finds any remaining impediment to the prompt allowance of any of these claims, which could be clarified in a telephone conference, the Examiner is respectfully urged to initiate the same with the undersigned.

DATED this 22nd day of December, 2005.

Respectfully submitted,



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